

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG CO.;
TATUNG COMPANY OF AMERICA, INC.; AND
VIEWSONIC CORPORATION,

Defendants.

Civil Action No. 04-343 (JJF)

Exhibits 22-23

FILED UNDER SEAL

**DEFENDANT VIEWSONIC CORPORATION'S D. DEL. LR 7.1.1
CERTIFICATION CONCERNING VIEWSONIC'S MOTION
TO COMPEL LPL re REQUEST FOR PRODUCTION 128
SUBMITTED TO SPECIAL MASTER POPPITI ON MAY 2, 2007**

Pursuant to D. Del. LR 7.1.1, defendant ViewSonic Corporation ("ViewSonic") submits this certification of its counsel's efforts to resolve the refusal by plaintiff LG.Philips LCD Co., Ltd. ("LPL") to produce any substantive discovery in response to ViewSonic's new discovery requests served February 23 and 28, 2007. This certification specifically relates to ViewSonic's May 2, 2007 Motion to Compel LPL re Request for Production 128 submitted contemporaneously herewith.

Paragraphs 1 and 2 of the January 17, 2007 Amended Scheduling Order (DI 401) (respectively amending paragraphs 4(e) and 4(d) of the August 18, 2005 Scheduling Order) permitted ViewSonic to serve additional discovery requests directed to claims 38-39, 44-45, and 56 of the '641 patent ("newly asserted claims of the '641 patent") and claim 36 of the '718 patent (collectively "newly asserted claims") by no later than February 28, 2007 so that proper responses could be timely served by no later than March 30, 2007. In compliance with the Court's directive, on February 23, 2007, ViewSonic served Request for Production ("RFP") Nos. 121-127, Interrogatory ("ROG") Nos. 30-34, and Request for Admission ("RFA") Nos. 34-37, and on February 28, 2007, ViewSonic served RFP Nos. 128-130, and ROG Nos. 35-37. Copies

of these discovery requests are enclosed as Exhibits 1-5. LPL's responses thereto, the last of which were served on March 30, 2007, are provided as Exhibits 6-10.

On April 13, 2007, ViewSonic advised via a letter LPL that LPL's responses to the new discovery requests were deficient, and requested to meet and confer regarding the deficient responses. Exhibit 11.

On April 18, 2007 ViewSonic and LPL met and conferred regarding ViewSonic's new discovery requests. The substance of the April 18 meet and confer is summarized in the email enclosed as Exhibit 12. The relevant portions of the transcript of the January 19, 2007 proceedings referenced in Exhibit 12 are provided at Exhibit 20.

The parties continued to meet and confer on April 19, 2007. The substance of the April 19 meet and confer is summarized in the emails enclosed as Exhibits 13-14. The relevant portions of the transcript of the December 28, 2006 proceedings referenced in Exhibit 14 and elsewhere are provided at Exhibit 21.

The parties continued to meet and confer on April 24, 2007. The substance of the April 24 meet and confer is summarized in the emails enclosed as Exhibits 15-18.

On May 1, the parties completed their meet and confer. The parties reached on agreement on RFAs 34-36, and appear to resolve their dispute regarding RFPs 121-122 and ROGs 30-31. The parties could not reach an agreement regarding the technical discovery ViewSonic seeks, which is the subject of ViewSonic's present motion. See Exhibits 19, 19-1. The relevant portions of the transcript of the March 9, 2007 proceedings referenced in Exhibit 19 are provided at Exhibit 22. This transcript is designated **Highly Sensitive Confidential**.

LPL's February 16, 2007 correspondence regarding LP's partial identification of products with "holes" on the rear surface is provided at Exhibit 23. A document with pages bates labeled LPL11775 to LPL11780, which was enclosed with LPL's February 16, 2007 letter, is designated **Highly Sensitive Confidential**.

Relevant portions of the prosecution history of LPL's U.S. Patent No. 6,501,641 cited in ViewSonic's instant motion are provided at Exhibit 24.

Date: May 2, 2007

Respectfully submitted,

Connolly Bove Lodge & Hutz LLP

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